

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Name of company covered by this certification: Computer Network Technology Corporation

Form 499 Filer ID: 821992

Name of signatory: Tyler Wall

Title of signatory: Secretary

I, Tyler Wall, certify that I am an officer of Brocade Communications Systems, Inc., the 2013 corporate parent of the company named above, and acting as an agent of the company, certify that during 2013, Computer Network Technology Corporation had established operating procedures adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (see **attached statement**).

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company did not receive any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: Tyler Wall

Date: 2-28-2014

Brocade Communications Systems, Inc.

STATEMENT of COMPLIANCE WITH CPNI RULES

In 2013, Computer Network Technology Corporation (CNTC), a subsidiary of Brocade Communications Systems, Inc., provided certain limited storage and networking solutions. As part of providing these services, in 2013 CNTC provided private line (all over lease lines from other carriers) telecommunications services to its customers. All of the contracts under which CNTC provided such services have expired and, as a result, there are no active telecommunications operations.

Under the CPNI rules, CPNI collected by CNTC may be used (1) to bill and collect for services rendered; (2) to protect rights or property of CNTC, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) to provide customer premises and protocol conversion; and (5) to provision inside wiring, maintenance and repair services.

CNTC only used CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. Sect. 64.2005. Accordingly, CNTC currently did not use CPNI in a manner that requires customer approval and was not required to implement a system by which the status of a customer's CPNI approval needed to be established prior to the use of CPNI.

CNTC's operations included policies preventing CNTC from sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties for the purposes of marketing any services.

CNTC's operations include a system to track all instances where customers were contacted for marketing purposes and for maintaining records of all such contacts for at least one year. CNTC's operations include a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review of applicable marketing activities. Currently, however none of the CPNI collected by CNTC is used for any outbound marketing campaigns.

All employees who have access to CPNI are trained as to when they are and are not authorized to use CPNI. For instance, employees are required to abide by a Code of Conduct, which requires employees to maintain the confidentiality of all information, including customer information that is obtained as result of their employment. Furthermore, employees are required to execute a Non-Disclosure Agreement which requires employees to maintain the confidentiality of all information obtained through their employment. Employees who violate the Code of Conduct, Non-Disclosure Agreement or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.